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LAWRENCE W. BIERLEIN
DOUGLAS M. CANTER
PHILIP L. CHABOT, JR.
JOHN M. CUTLER, JR.
ANDREW P. GOLDSTEIN
STEVEN J. KALISH
RICHARD D. LIEBERMAN
CHANNING D. STROTHER, Jr.

LAW OFFICES
MCCARTHY, SWEENEY & HARKAWAY, P.C.
SUITE 600
2175 K STREET, N.W.
WASHINGTON, D.C. 20037
(202) 775-5560

FACSIMILE
(202) 775-5574

E-MAIL
MSH@MSHPC.COM

WEBSITE
HTTP://WWW.MSHPC.COM

NICOLE S. ALLEN, ASSOCIATE*
WARREN S. FELDMAN, STAFF ATTORNEY

*ADMITTED IN NY

August 10, 2006

Vernon A. Williams
Secretary
Surface Transportation Board
1925 K Street, N.W.
Washington, DC 20423

Re: PYCO Industries, Inc. – Feeder Line Application – South Plains Switching, Finance Docket No. 34890, et al.

Dear Secretary Williams:

Southern Cotton Oil Company ("SCO"), a division of Archer Daniels Midland Company, is a shipper of cotton seed oil and meal. It is served by South Plains Switching, Ltd. ("SAW") and located on that part of its railroad line that is beyond what has been identified by the Board in this proceeding as the "Alternative Two" segment.

SCO is aware of a filing by PYCO Industries, Inc. ("PYCO"), posted on the Board's website two days ago, in which PYCO seeks to convert this proceeding from one in which PYCO's application applies only to the Alternative Two segment to one in which PYCO seeks to pursue an "all-SAW" alternative. At the same time, PYCO objects to consideration by the Board of an "all-SAW" proposal that Keokuk Junction Railway Company ("KJRY") intends to pursue.

The purpose of this short letter is to inform the Board that SCO intends to make a more complete filing by Monday, August 14, 2006 containing reasons why SCO believes it is important that the entire SAW line remain intact and not be divided between two operators. SCO intends to urge the Board to entertain, on fair and equitable grounds, proposals to acquire the entire SAW line and to consider fully the claim of BNSF Railway Company ("BNSF") to have a right of first refusal to acquire the entire SAW line.

SCO intends to advise the Board that the Board should afford all interested parties, including PYCO and KJRY, wishing to pursue an all-SAW alternative, a full and

fair opportunity to do so. We request the Board to take no dispositive action until parties have an opportunity to respond fully to the pending acquisition proposals.

Respectfully submitted,

Andrew P. Goldstein
Attorney for
Southern Cotton Oil Company

cc: All Parties